



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

FEB 17 2006

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Chuck Weir
Chair, Tri-TAC
East Bay Dischargers Authority
2651 Grant Avenue
San Lorenzo, CA 94580

Dear Mr. Weir:


Thank you for your letter of January 27, 2006, regarding your request to require registration of the Samsung "Silver Wash" washing machines, and silver ion electrode pesticide products. As you may know, my staff in the Antimicrobials Division within the Office of Pesticide Programs is responsible for reviewing the registration of these types of products, and determining if such a product would be considered a pesticidal device under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).

We understand that Tri-TAC, as the technical advisory group for Public Owned Treatment Works (POTWs) in California, has concerns about potential water quality impacts of residential pesticide uses, specifically the discharge of silver into the environment resulting from the silver ion electrodes used in this product. We also understand your interest in having the efficacy claims for the product evaluated. We want to assure you that we are carefully considering your recommendations and the issue of registration of products that use silver ion electrodes as disinfectants.

At this time, this issue is being reevaluated and we anticipate having a decision within the next few weeks. Once a determination is made as to whether the product requires registration, we will be able to evaluate potential environmental issues, and assess what efficacy data would be required to support any claims.

If you have any questions, feel free to contact me at 703-305-7090. If your staff needs a contact person, they may reach Marshall Swindell, Product Manager, Antimicrobials Division, Office of Pesticide Programs, at 703-308-6341.

Sincerely,



James J. Jones, Director
Office of Pesticide Programs

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January 27, 2006

Jim Jones, Director
Office of Pesticide Programs
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Ave. NW
Washington, D.C. 20460

Dear Mr. Jones:

Request to Require Registration of Samsung Silver Wash clothing washing machine, and Silver Ion Pesticide products

The purpose of this letter is to request that the U.S. Environmental Protection Agency (EPA) require the registration of Samsung's "Silver Wash" washing machine, and that the EPA require the registration of any other products that utilize silver ions as disinfectants. As background, Tri-TAC is a technical advisory group for Publicly Owned Treatment Works (POTWs) in California. Tri-TAC is jointly sponsored by the California Association of Sanitation Agencies, the California Water Environment Association, and the League of California Cities. The constituency base for Tri-TAC collects, treats, and reclaims more than two billion gallons of wastewater each day and serves most of the sewered population of California.

Tri-TAC's member agencies are very concerned about the water quality impacts of residential pesticide uses. We have noted the increased marketing of household products that contain pesticides, such as mattress liners and clothing impregnated with permethrin. Products such as these will result in pesticide releases when clothing and mattress liners are laundered. These concerns have been expressed in previous letters from Tri-TAC. The Samsung "Silver Wash" washing machine is now being marketed under manufacturer claims that it achieves 99.99% sterilization of bacteria, and that it provides a silver ion residual on clothing that is effective for up to 30 days. Please refer to Samsung's website at:

<http://www2.samsung.co.za/silvermano/silvermano/washingmachine.html>

The Samsung Silver Wash washing machine is specifically designed to release silver ions during each washing cycle. These silver ions will then be discharged into sanitary sewer systems.

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